

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DIRECT REPORT CORPORATION d/b/a
SHAREHOLDER.COM,

Plaintiff,

v.

CCBN.COM, INC., THE THOMSON
CORPORATION, JOHN DOES 1 through 5,
JANE DOES 1 through 5,

Defendants.

Civil Action
No. 04-10535 PBS

**PLAINTIFF SHAREHOLDER.COM'S
MOTION TO IMPOUND ITS OPPOSITION TO
DEFENDANTS' EMERGENCY MOTION FOR A PROTECTIVE ORDER**

Pursuant to Local Rule 7.2, Plaintiff Shareholder.com moves for the impoundment of its Opposition to Defendants CCBN.com, Inc. and the Thomson Corporation's Emergency Motion for a Protective Order. Impoundment is necessary because the brief discusses and attaches deposition testimony that the defendants have designated as either "Confidential" or "Highly Confidential" under the Stipulated Protective Order in this case. While Shareholder.com does not agree with the designations made by the defendants, given the emergency nature of the relief sought, and in an abundance of caution, Shareholder.com moves for impoundment. Under the protective order (attached hereto as Exhibit A), documents filed with the Court containing information designated "Confidential" or "Highly Confidential" must be accompanied by a motion for impoundment.

Respectfully submitted,

/s/ John T. Bennett

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